

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ANDREW HINESLEY,
Plaintiff,

v.

GRAY TELEVISION, INC., d/b/a HAWAII NEWS
NOW,

Defendant.

No. 1:25-cv-11488-IT

MOTION FOR LEAVE TO FILE OPPOSITION PROVISIONALLY UNDER SEAL

Pursuant to the Court’s May 27, 2025 Order, Defendant Gray Media, Inc., d/b/a Gray Television (“Gray Media”) hereby moves the Court for leave to file a provisionally sealed Opposition to Plaintiff’s Motion to Seal. *See* Dkt. 8 (“No response to the Emergency Motion 2 shall be filed on the public docket, but the court anticipates granting a motion for leave to file a response under seal.”).

Gray Media respectfully submits that the Opposition, as well as the other filings in this case, should be public, pursuant to the First Amendment and common law rights of access to judicial records. However, pursuant to the Court’s Order, Gray Media seeks leave to file its Opposition provisionally under seal while the Court considers Plaintiff’s Motion to Seal.

Dated: May 28, 2025

Respectfully submitted,

BALLARD SPAHR LLP

/s/ James V. Masella, III

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**Pro hac vice* forthcoming

Counsel for Defendant Gray Media, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May, 2025, I caused a true and correct copy of the foregoing to be served by U.S. mail and email on the following:

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/s/ James V. Masella, III
James V. Masella, III